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17 *Attorneys for Plaintiffs*

18 UNITED STATES DISTRICT COURT

19 DISTRICT OF NEVADA

20 PATRICIA FITZPATRICK and ROBERT) Case No.: 2:17-cv-1886-JAD-BNW
21 L. ANSARA, as Special Co-Administrators)
22 and Personal Representatives of the Estate)
23 of JEREMIAH BOWLING, deceased; and)
24 PATRICIA FITZPATRICK, as Heir and)
25 Mother of JEREMIAH BOWLING,)
26 deceased,)
27 Plaintiffs,)
28 v.)
29)
30 LAS VEGAS METROPOLITAN POLICE)
31 DEPARTMENT, a political subdivision of)
32 the State of Nevada; THOMAS STRIEMER,)
33 Corrections Officer, individually and in his)
34 official capacity; ANGELO LARRY,)
35 Corrections Officer, individually and in his)
36 official capacity; ROLANDO TREVINO,)
37 Corrections Officer, individually and in his)
38 official capacity; and NAPHCARE, INC., an)
39 Alabama corporation,)
40 Defendants.)
41 _____)

1 COME NOW PLAINTIFFS PATRICIA FITZPATRICK and ROBERT L. ANSARA, by
2 and through their counsel of record, NADINE M. MORTON ESQ. of MORTON LAW, PLLC, and
3 A. J. SHARP, ESQ. of SHARP LAW CENTER, Defendant THOMAS STRIEMER and Third Party
4 LAS VEGAS METROPOLITAN POLICE DEPARTMENT, by and through their counsel of record,
5 ROBERT W. FREEMAN, ESQ. of LEWIS BRISBOIS BISGAARD & SMITH LLP, and Defendant
6 NAPHCARE, INC., by and through its counsel of record, S. BRENT VOGEL, ESQ. of LEWIS
7 BRISBOIS BISGAARD & SMITH LLP (collectively herein, the “Parties”), and Stipulate to conduct
8 the continued deposition of Las Vegas Metropolitan Police Department, pursuant to FRCP 30(b)(6),
9 from Friday, June 19, 2020, to **Friday, September 11, 2020, at 10:00 a.m.** Pursuant to Local Rule
10 IA 6-1(a), the Parties represent that this is the third request for extension of this time, as explained
11 below.

12 **PROCEDURAL BACKGROUND**

13 On February 14, 2020, this Court granted the Parties’ Stipulation to conduct the continued
14 FRCP 30(b)(6) deposition of Las Vegas Metropolitan Police Department (“LVMPD”) on
15 April 3, 2020. *Docket Filing #132*. On April 1, 2020, this Court approved extension of the
16 continuance through Friday, June 19, 2020, in light of the need for Defense counsel’s office to be
17 reconfigured to accommodate the ongoing COVID-19 pandemic. *Docket Filing #147*.

18 However, in late May 2020, Defense counsel’s firm imposed a “phased-in reopening” of its
19 office, such that in-person depositions will not be possible until at least late August. Moreover, in
20 the interim, Defense counsel learned that LVMPD’s prior FRCP 30(b)(6) designee, Sergeant
21 Albright, had been reassigned to a different department, and that LVMPD therefore chose to
22 designate a different individual for the remainder of the deposition. Because of the firm’s
23 COVID-19 restrictions, Defense counsel will not be permitted to meet in-person with the new
24 designee to prepare for the deposition until late August.
25 //
26 //
27 //
28 //

The Parties therefore have agreed to Stipulate, subject to this Court's approval, to conduct the continued FRCP 30(b)(6) deposition of LVMPD on **Friday, September 11, 2020, at 10:00 a.m.** The Parties aver that good cause exists for the requested stay and that this Stipulation is not submitted for purposes of delay.

DATED this 19th day of June, 2020.

DATED this 19th day of June, 2020.

MORTON LAW, PLLC

**LEWIS BRISBOIS BISGAARD
& SMITH**

/s/ Nadine M. Morton
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DATED this 19th day of June, 2020.

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and Third Party Las Vegas Metropolitan Police Department

ORDER

IT IS SO ORDERED.

Dated this 22nd day of June, 2020.

UNITED STATES MAGISTRATE JUDGE